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January 21, 2021

**Via ECF**

Hon. Loretta A. Preska  
U.S. District Court for the Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: **Giuffre v. Dershowitz, No. 19-cv-3377-LAP**

Dear Judge Preska:

We represent non-party Sharon Churcher in connection with the Subpoena served on her by Defendant Alan Dershowitz. In our letter of January 7, 2021 (ECF No. 234), we requested that the Court continue to hold our request for a pre-motion conference for a motion to quash in abeyance while we conferred with the parties to determine whether the issues in the potential motion could be narrowed or resolved. The Court granted that request. *See* ECF No. 235. Since then, we have continued to confer in good faith with the parties, and believe that we have reached an agreement in principle that will obviate the need for motion practice at this time.

We reserve the right to renew our request for a pre-motion conference in the event that we are not able to finalize the agreement with the parties or motion practice otherwise becomes necessary. And the parties have both agreed that, in such event, they will not assert that a later request for a pre-motion conference is untimely.

Accordingly, we withdraw our prior request for a pre-motion conference at this time. We thank the Court for its attention to and consideration of this matter.

Respectfully Submitted,

Davis Wright Tremaine LLP

/s/ Laura R. Handman

cc: All parties (via CM/ECF)

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